

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: BRIAN C SUMRALL

CHAPTER 13 # 23-50927KMS

MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS,  
INCLUDING ONGOING MORTGAGE PAYMENTS

Debtor files this Motion to Suspend Chapter 13 Payments respectfully showing unto the Court as follows:

1. The Debtor has a post-petition arrearage in the plan payments that accumulated over the past twelve months or more.
2. The Debtor desires to increase the amount of the plan payments to cure the post-petition arrearages over the remainder of the plan.
3. The Debtor proposes to suspend the missed post-petition plan payments and begin their ongoing regular payments in April 2025.
4. During the previously missed payments, the Debtor also missed making the regular ongoing mortgage payments which are being paid inside the Chapter 13 plan. The Debtor moves that the mortgage payments which were missed also be cured on an altered basis over the life of the plan and requests that the Trustee be authorized to adjust his plan payment as necessary to fund this Chapter 13 plan over the remaining term.

Wherefore, Debtors pray this Court will enter its Order granting the suspension as requested. Debtor prays for such other, further and general relief to which they may be entitled.

Respectfully submitted,

April 7, 2025

/s/ Rachel Coxwell

Rachel A. Coxwell MSB#105559

Coxwell Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that to the extent any party is not served electronically by the CM/ECF system, I have caused a copy of the foregoing Motion to be sent by First Class U.S. mail, postage prepaid, to all creditors listed on the attached PACER mailing matrix, the U.S. Trustee and the Ch 13 Trustee:

US Trustee, [USTPRegion05.ja.ecf@usdoj.gov](mailto:USTPRegion05.ja.ecf@usdoj.gov)  
Chapter 13 Trustee, David Rawlings, POB 556, Hattiesburg MS 39403

/s/ Rachel Coxwell

Rachel A. Coxwell MSB#105559  
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April 7, 2025

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: BRIAN C SUMRALL

CHAPTER 13 # 23-50927KMS

NOTICE OF FILING MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS,  
INCLUDING ONGOING MORTGAGE PAYMENTS

You are hereby notified that the above debtor has filed with the Bankruptcy Court a Motion to Suspend Payments of the Chapter 13 Plan.

You are further notified that if you desire to file an objection to the suspension, you must do so within twenty-one (21) days of the date of this notice and file the original with the Court at: U. S. Bankruptcy Court, 501 E Court Street Suite 2.300, Jackson, MS 39225-2448

If no objection is timely filed, the Court may approve the Plan as modified.

/s/ Rachel Coxwell

Rachel A. Coxwell MSB#105559  
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Jackson, MS 39216-4850  
601 948-4450 voice  
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Chapter 13 Trustee, David Rawlings, POB 556, Hattiesburg MS 39403

/s/ Rachel Coxwell  
Rachel A. Coxwell

April 7, 2025